

EXHIBIT 1

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF PIERCE

DONALD VARNEY and MARIA VARNEY,
Husband and Wife,

Plaintiffs,

v.

AIR & LIQUID SYSTEMS CORPORATION,
et al.,

Defendants.

No. 18-2-05312-4

DECLARATION OF DONALD
VARNEY

I, Donald Varney, declare as follows:

1. I have personal knowledge of the facts and circumstances set forth below. I make these statements regarding the cause and circumstances of my death under a sense of impending death from mesothelioma. I have no hope or expectation of recovery from this terminal disease.

2. My father was an auto mechanic at Darigold when I was a child. He worked on the brakes, clutches, and gaskets on Darigold's fleet of vehicles. He came home from work dusty. My mother shook out and washed his laundry in our family home. I was often with her when she did this work.

3. I worked as a marine machinist at Puget Sound Naval Shipyard in Bremerton, Washington, from 1957 to 1962 and again from 1968 to 1972. From 1965 to 1968, I worked as a marine machinist at Hunter's Point Naval Shipyard in San Francisco, California.

4. During my time at both of these shipyards, I breathed dust from the removal and replacement of asbestos-containing gaskets, packing, and insulation associated with the following machinery:

- Turbines manufactured by General Electric and Westinghouse;
- Valves manufactured by Crane, Edward, Atwood, and Crosby;
- Pumps manufactured by Warren, Chicago, Buffalo, Goulds, Peerless, Pacific, Bell & Gossett, Allis Chalmers, Byron Jackson, Deming, and Denison;
- Compressors manufactured by Carrier and Ingersoll-Rand;
- Forced draft blowers by Sturtevant;
- Steam traps manufactured by Armstrong; and
- Boilers manufactured by Babcock and Foster Wheeler.

The gaskets and packing we used were Cranite, John Crane, and the original manufacturers of the equipment.

5. I personally worked removing and replacing gaskets, packing and insulation from thousands of valves and pumps. I worked on and around dozens of boilers, turbines, compressors, steam traps, and forced draft blowers.

6. The work removing and replacing the gaskets, packing and insulation was very dusty. I breathed the dust from the work.

7. I never saw a warning about asbestos or cancer on a single product from any of these companies. If I had, I would have tried to protect myself. Since I did not know the dust caused cancer, I never wore a mask or respirator to protect myself.

I declare under penalty of perjury under the laws of the state of Arizona and Washington that the foregoing is true and correct.

DATED this 7th day of February, 2018, at Goodyear, Arizona.

State of AZ County of MARICOPA

Signed before me on this 7 day

of FEB 2018 by Stephen J. Paris

Notary Public Stephen J. Paris

DONALD VARNEY

